

MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

Plaintiffs' Executive Committee for Personal Injury and Death Claims	Plaintiffs' Executive Committee for Commercial Claims
Ronald L. Motley, (1944-2013) Jodi Westbrook Flowers / Donald A. Migliori, <i>Co-Chairs</i> MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Elliot R. Feldman, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Robert T. Haefele, <i>Co-Liaison Counsel</i> MOTLEY RICE LLC	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

VIA ECF

April 28, 2017

The Honorable Sarah Netburn
Thurgood Marshall United States Courthouse
40 Foley Square, Room 430
New York, NY 10007

RE: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Judge Netburn:

The Plaintiffs' Executive Committees write in regards to defendant Perouz Sedghaty's Suggestion of Bankruptcy (ECF No. 3531) and his counsels' Motion to Withdraw as Counsel of Record (ECF No. 3534).

As Your Honor is Aware, plaintiffs have a pending motion for attorneys' fees and costs (ECF Nos. 3486-3490), submitted pursuant to the Court's February 15, 2017 Order (ECF No. 3447) concerning plaintiffs' six year quest to obtain basic discovery from defendant Sedaghaty. Pursuant to the Court's March 29, 2017 Order (ECF No. 3492), Sedaghaty was required to respond to plaintiffs' motion for attorneys' fees and costs by today, April 28, 2017. Two days before that deadline, Sedaghaty filed his Suggestion of Bankruptcy, and earlier today his counsel moved to withdraw, citing "professional considerations."

The Plaintiffs' Executive Committees are reviewing the Motion to Withdraw to determine if there are any issues that need to be raised with respect to that application before the Court rules on it. We do not yet know whether plaintiffs will be taking any position on the matter, but would respectfully request that plaintiffs be afforded until Friday, May 5, 2017 to file a submission relating to the Motion to Withdraw, should plaintiffs determine it appropriate to do so.

The Honorable Sarah Netburn

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Respectfully submitted,

COZEN O'CONNOR


By: J. Scott Tarbutton

cc: The Honorable George B. Daniels (via ECF and Federal Express)
All MDL Counsel of Record (via ECF)

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